

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

Return Date: 5/9/2013

Time: 9:30 a.m.

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In Re:

KINAN NIMEH,

**CHAPTER 13
CASE NO.: 13-71929-AST**

NOTICE OF MOTION

Debtor.

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MADAMS/SIRS:

PLEASE TAKE NOTICE that, upon annexed Affidavit of Kinan Nimeh, the Chapter 13 Debtor herein, all prior proceedings heretofore and herein, the undersigned will move this Court before the Honorable Alan S. Trust, U.S. Bankruptcy Judge, at 290 Federal Plaza , Central Islip, New York on the 9th of May, 2013 at 9:30 a.m. or as soon thereafter as counsel may be heard, for an Order Pursuant to 11 U.S.C. Section 362(c)(3) continuing the Automatic Stay as to all creditors for the duration of this case. Answering papers, if any, shall be served so as to ensure actual receipt no later than three (3) days before the return date pursuant to local Bankruptcy Rule 9006-1.

Dated: Melville, New York
April 16, 2013

/s/ Peter Corey
Peter Corey, Esq.
Attorney for Kinan Nimeh
Macco & Stern, LLP
135 Pinelawn Road, Suite 120 South
Melville, New York 11747
(631) 549-7900

TO: Marianne DeRosa, Chapter 13 Standing Trustee
U.S. Trustee's Office
ALL CREDITORS AND PARTIES IN INTEREST